

UNITED STATE DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT  
SEATTLE

JORDAN EL-TAHEL,	) Case No.: 2:20-CV-01830-JCC
	)
Plaintiff,	) DEFENDANT MILLER'S FIRST
	) AMENDED ANSWER TO
vs.	) COMPLAINT
	)
WHATCOM COUNTY, a governmental entity,	)
WHATCOM COUNTY SHERIFF'S	)
DEPARTMENT, BILL ELFO and ADAM	)
MILLER, and the marital community	)
Defendant.	

TO: JORDAN EL-TAHEL

AND TO: EMILY BESCHEN AND ROBERT BUTLER, BUTLER BESCHEN LAW PLLC, E.  
Holly St. Suite 512, Bellingham WA 98225, attorneys for Plaintiff

AND TO: GEORGE ROCHE, Whatcom County Prosecuting Attorney 311 Grand Ave Suite  
201, Bellingham WA 98225, attorney for Whatcom County, Whatcom County Sheriff's Office  
and Bill Elfo.

COMES NOW, Adam Miller by and through the Law Office of Douglas Wilson, hereby  
answers Plaintiff's Complaint:

1. Admit

1 2. Admit

2 3. Defendant Miller is without sufficient information to admit or deny and therefor denies  
3 the same.

4 4. Defendant Miller admits that he was employed by Whatcom County between February  
5 27, 2017 and February 20, 2019.

6 5. Admit

7 6. Admit

8 7. Defendant Miller admits that he was employed by Whatcom County between February  
9 27, 2017 and February 20, 2019.

10 8. Defendant Miller admits to kissing Jordan El-Tahel. The remainder of the allegations are  
11 denied.

12 9. Allegation is directed to Defendant Whatcom County and calls for a legal conclusion.

13 10. It is admitted that the Defendant Miller stopped by a friend of Jordan El-Tahel's  
14 unannounced, but it is denied that Miller saw Jordan El-Tahel, stalked her or initiated  
15 sexual advances.

16 11. Defendant Miller admits that Plaintiff returned to custody in the fall of 2018 while he  
17 was working at the facility. The remainder is denied.

18 12. Denied.

19 13. Denied.

20 14. Allegations are directed to the County.

21 15. Defendant Miller admits to kissing Plaintiff El-Tahel and that Jordan El-Tahel was not  
22 at all times on camera. The remainder is denied.

1 16. Defendant Miller admits to using a phone that was often used by attorneys. The  
2 remainder is denied.

3 17. Defendant Miller admits that he was directed to inform Jordan El-Tahel that she could  
4 be placed in isolation if she made false accusations. Some of her allegations were false.

5 18. Allegations are directed to employees of Whatcom County and not Defendant Miller.

6 19. Allegations are directed to Defendant Whatcom County and not Defendant Miller.

7 20. Allegations are directed to Defendant, Whatcom County and not Defendant, Miller.

8 21. Allegations are directed to Defendant, Whatcom County and not Defendant, Miller.

9 22. Defendant Miller admits to kissing Jordan El-Tahel. The remainder is denied or calls  
10 for a legal conclusion.

11 23. Paragraph 23 does not require an admissions or a denial.

12 24. Allegations are directed to Defendant, Whatcom County and not Defendant, Miller.

13 25. Paragraph 25 does not require an admissions or a denial.

14 26. To the extent that the allegation does not call for a legal conclusion it is denied.

15 27. Paragraph 27 does not require an admissions or a denial.

16 28. Defendant Miller admits to pleading guilty to two counts of sexual misconduct. The  
17 remainder is denied.

18 29. Paragraph 29 does not require an admissions or a denial.

19 30. Defendant Miller admits he plead guilty to two counts of sexual misconduct.

20 31. Paragraph 31 does not require an admissions or a denial.

21 32. To the extent the allegation does not call for a legal conclusion it is denied.

22 33. Paragraph 33 does not require an admissions or a denial.

23 34. Denied.  
24  
25

1 35. Paragraph 35 does not require an admissions or a denial.

2 36. Allegation is directed to a different defendant and does not require and admission or  
3 denial from Defendant Miller.

4 37. Paragraph 37 does not require an admissions or a denial.

5 38. Allegations are directed at a different defendant and does not require Adam Miller to  
6 admit or deny.

7 AFFIRMATIVE DEFENSES

- 8
- 9 1. Failure to state a claim upon which relief can be granted
  - 10 2. Third-parties over who Defendant, Miller had no control are liable for the Plaintiff's  
11 alleged damages.
  - 12 3. Failure to mitigate damages
  - 13 4. Defendant, Miller reserves the right to amend this Answer to include additional  
14 affirmative Defenses.

15 RELIEF REQUESTED

16 Defendant, Miller respectfully request the action be dismissed with prejudice.

17  
18 Dated March 9th, 2021.

19 THE LAW OFFICE OF DOUGLAS E. WILSON

20 /s Douglas Wilson

21 Douglas E. Wilson, WSBA #21206  
22 Attorney for Defendant Adam Miller  
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